

Doc. No.: QAS 16.04

Revision: 2

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Approval: Original Signed by Mark Arenaz Date: 12/18/01

Manager, National Spent Nuclear Fuel Program

Approval: Original Signed by Robert Blyth Date: 12/18/01

NSNFP Quality Assurance Program Manager

I. PURPOSE AND SCOPE

This procedure establishes the process and responsibilities of the National Spent Nuclear Fuel Program (NSNFP) for identifying and issuing stop work orders (SWOs) identified in the NSNFP, NSNFP suppliers, and U.S. Department of Energy (DOE) spent nuclear fuel (SNF) sites.

II. SUMMARY

This procedure describes personnel responsibility, the process, and criteria for evaluating significant conditions adverse to quality for a SWO, documentation of the SWO, protocols for communicating a SWO with interfacing organizations, and closure.

III. PROCEDURE

A. Evaluating Significant Conditions Adverse to Quality for a Stop Work Order and Notification

All NSNFP Personnel 1. All DOE-ID and INEEL Management and Operations (M&O) contractor employees have the authority and responsibility to stop a specific work activity that presents an imminent danger condition at facilities within DOE-ID's span of control.

LA/Auditor

- 2. For SNF activities at DOE sites and NSNFP suppliers, immediately notify the responsible supervisor or manager of an imminent danger situation.
- QASM/LA
- 3. Evaluate significant conditions adverse to quality, as determined from QAS 16.02, "Corrective Action," against the criteria in Attachment A. The evaluator will use the criteria applicable to the program or facility under the NSNFP, NSNFP suppliers, or DOE SNF sites.
- 4. If the significant condition adverse to quality does not meet the stop work criteria, annotate the Corrective Action Request (CAR) as "Stop Work: No." If the significant condition adverse to quality meets the criteria for a SWO, indicate "Yes" on the CAR and implement the following actions:
 - a. Notify the Quality Assurance Staff Manager (QASM)/Quality Assurance Program Manager (QAPM) of the significant condition adverse to quality and the stop work criteria that apply to the condition.
 - b. Obtain QAPM concurrence that a SWO condition exists.

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QAPM 5. Notify the Manager, NSNFP and discuss the pending SWO.

QAPM/ Manager, NSNFP 6. Immediately notify the responsible organization and lead auditor (LA) by e-mail to stop work as follows.

QAPM

a. For NSNFP activities, verbally notify the Manager, NSNFP of the SWO. Generate a followup e-mail notification.

QAPM/ Manager, NSNFP

b. For NSNFP suppliers, notify the responsible Program Support Organization (PSO) Technical Staff Personnel and Manager, NSNFP of the SWO. Direct the procurement agent to notify the vendor of the pending SWO.

QAPM

- c. For DOE SNF sites, notify the Manager, NSNFP; Manager, DOE-ID; and the Office of Nuclear Material and Spent Fuel (EM-21) representative when DOE SNF site interfaces are involved. The QAPM will request the EM-21 representative to contact the applicable SNF sites' responsible management to initiate a SWO in accordance with their Quality Assurance (QA) program.
- QASM/LA 7. Initiate Form 16.04-1, "Stop Work Order," according to the form instructions. Print name, sign, and date the SWO, recording the name of the person notified and date of notification.
 - a. Attach a copy of the e-mail used for notification and the SWO to the corresponding CAR, and transmit the documents to the NSNFP QAPM.

QAPM 8. Approve the SWO according to form instructions.

QASM/LA

9. Transmit the SWO to the responsible organization in conjunction with the corresponding CAR and instructions on how to respond to the CAR. When the SWO involves a vendor, all correspondence and/or notifications are to be sent through the responsible PSO Technical Staff Personnel.

B. Responding to a Stop Work Order

QASM/LA

- 1. Request the responsible organization to e-mail the NSNFP QAPM and confirm that the designated work has been stopped. This confirmation should be sent by the close of business on the day following the SWO notification.
- 2. Ensure the responsible organization is advised of the following:
 - Upon notification of a stop work condition, ensure the specific work activity affected by the stop work action is stopped.
 - Work the CAR and associated SWO in conjunction with each other to satisfactorily attain resolution and closure.



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QASM/LA

• Implement the instructions provided in accordance with QAS 16.02 to resolve the CAR in support of SWO closure.

 When necessary, request a partial restart of a specific activity by submitting a memo to the NSNFP QAPM with a copy to the NSNFP Corrective Action Coordinator (CAC) that identifies the specific activity for partial restart, reasons necessary for restart, and corrective action performed to allow the partial restart.

C. Requesting Partial Restart for a Specific Activity of the Stop Work Order

QASM/ LA

- 1. Upon receipt, review the request for partial restart and verify that any remedial action or action to prevent recurrence mitigates the significant adverse condition such that the activity for partial restart will not meet the criteria for a SWO.
 - a. If the request is unacceptable, return the request to the responsible organization for clarification, additional information, or acceptable corrective action according to QAS 16.02.
 - b. Attach the partial restart request memo to the SWO.
- 2. If the response is acceptable, verify remedial action and action to prevent recurrence associated with the partial restart by surveillance or document review according to QAS 16.02.
- 3. Record acceptance of the partial restart on the SWO form and submit all documentation associated with the partial restart to the NSNFP QAPM for approval.

QAPM

4. Verbally notify the responsible organizations that the request for partial restart for the specific activity is acceptable, and followup by e-mail, specifying the scope of work/activity authorized for restart.

D. Total Restart Corrective Action Verification for Lifting Stop Work Order

LA 1. Perform verification of remedial action and action to prevent recurrence by surveillance or document review as described in QAS 16.02.

- a. If verification finds satisfactory completion of remedial action and action to prevent recurrence, process closure of the SWO concurrent with the CAR.
- b. If verification finds unsatisfactory completion of remedial action and action to prevent recurrence, notify the QAPM and responsible organization. Identify the unsatisfactory conditions and document them on Part III of the CAR form. Transmit a copy of Part III of the CAR to the responsible organization.



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LA 2. Notify the NSNFP QAPM of the acceptance of the corrective/remedial action for the CAR and SWO and recommend lifting the SWO.

- a. Submit the CAR and SWO to the NSNFP QAPM for signature and date to approve closure.
- QAPM 3. For the NSNFP, contact the Manager, NSNFP to discuss the acceptable remedial action/action taken to prevent recurrence and provide verbal notification that the SWO can be lifted.
 - a. Print name, sign, and date the SWO and CAR to approve closure. Forward SWO and CAR to the NSNFP CAC.
 - 4. For SNF-related activities within the DOE site complex, contact EM-21 and notify them that remedial actions/actions to prevent recurrence have been completed and accepted as satisfactory. EM-21 is responsible for lifting the SWO (in part or total). Forward the CAR and SWO to the NSNFP CAC.
 - 5. For NSNFP suppliers, notify the Manager, NSNFP and the responsible procurement agent that remedial action and action to prevent recurrence have been completed and accepted as satisfactory. Forward the CAR and SWO to the NSNFP CAC.

CAC 6. Update CATTS database to reflect closure of the CAR and SWO and forward the documentation to the LA.

E. Preparation of Quality Assurance Records

- LA 1. When a SWO is closed, compile the individual SWO and associated CAR with supporting documentation into a stand-alone quality record package.
 - 2. Process each SWO with the associated CAR quality record package into the quality records system (as part of the implementation of QAS 16.02).

IV. REFERENCES

DOE/SNF/MTX-001, The National Spent Nuclear Fuel Program QARD Requirements Matrix, current revision.

V. **DEFINITIONS**

Terms appearing in italics followed by the notation "see glossary" are defined in the NSNFP Documents Manual Introduction and Glossary.

VI. ATTACHMENTS

Attachment A, Review Criteria for a Stop Work Order



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VII. RECORDS

The following records generated as a result of this procedure require retention in accordance with the identified classification and PMP 17.01.

Lifetime

- A. Closed SWOs and supporting documentation
- B. Memo requesting partial restart
- C. Memo lifting stop work
- D. All e-mail requests, notifications, and approvals.

Nonpermanent

None.



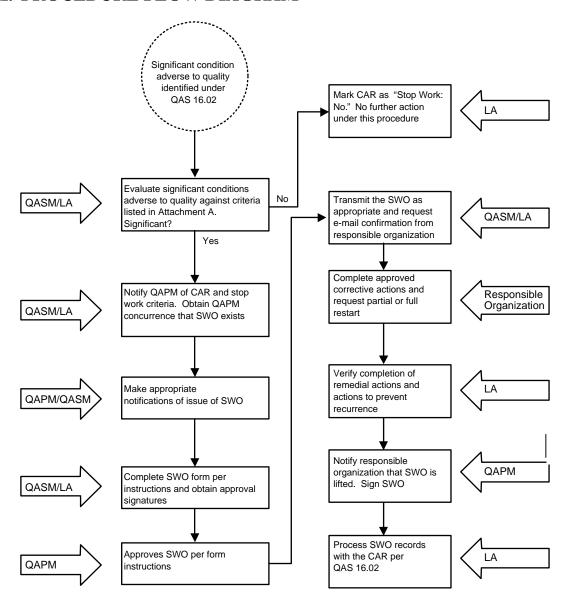
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VIII. PROCEDURE FLOW DIAGRAM





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Attachment A

Review Criteria for a Stop Work Order

For activities within NSNFP, evaluate the significant condition adverse to quality against the following criteria to determine if a stop work order (SWO) is required.

- A condition or practice exists that would put an individual in an imminent danger situation
- A significant condition hazardous to the safety and health of workers or the public
- A significant condition adverse to quality identified during a work activity (processing, installation, or modification), where if work is not stopped, the product will be rendered unusable
- The quality of scientific investigation results would be irreparably compromised
- A significant breakdown or failure in the implementation of Quality Assurance Requirements and Description (QARD) requirements that would compromise the quality of items or activities important to safety or waste isolation
- A condition that would compromise acceptance of spent nuclear fuel (SNF) by the Office of Civilian Radioactive Waste Management.

For SNF- related activities at DOE SNF sites, evaluate significant conditions adverse to quality against the following criteria to determine if a SWO is required.

- A condition or practice exists that will put an individual in an imminent danger situation
- The quality of scientific investigation results would be irreparably compromised
- A significant breakdown or failure in the implementation of QARD requirements that would compromise the quality of items or activities important to safety or waste isolation in relation to the repository
- A condition that would compromise acceptance of SNF by OCRWM.

For NSNF Program suppliers, evaluate significant conditions adverse to quality against the following criterion to determine if a SWO is required:

• A violation of the procurement contract, technical requirements, design drawings, or approved procedures, which would render the items or services unacceptable for use.